

From: [McClintock, Katie](#)
To: [Marshallon, Dino](#)
Subject: FW: Stimson Plummer - Notification to EPA of Potential COVID-19 Related Deviation & Request for Enforcement Discretion
Date: Monday, April 06, 2020 11:07:17 AM
Attachments: [image001.png](#)
[image002.jpg](#)

Enjoy. I am not sure why Kelly sent the response, but that is a problem for a me who has enough time to worry about other people doing work I can't get to on my to do list.



Katie McClintock
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Air Toxics and Enforcement Section
Enforcement and Compliance Assurance Division
U.S. EPA Region 10
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Seattle, WA 98101
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From: McFadden, Kelly <McFadden.Kelly@epa.gov>
Sent: Monday, April 6, 2020 9:04 AM
To: spetrin@stimsonlumber.com
Cc: Brozusky, Sandra <Brozusky.Sandra@epa.gov>; Todd, Bill <Todd.Bill@epa.gov>; Brozusky, Sandra <Brozusky.Sandra@epa.gov>; McClintock, Katie <McClintock.Katie@epa.gov>; lhiggins@cdatribe-nsn.gov; KCrider@stimsonlumber.com; beth@springenvironmental.com; Meyer, Dan <Meyer.Dan@epa.gov>; Familiare, Christopher S. <familiare.christopher@epa.gov>
Subject: RE: Stimson Plummer - Notification to EPA of Potential COVID-19 Related Deviation & Request for Enforcement Discretion

Steven,

Thank you for your message below regarding Method 9 certification at Stimson Lumber.

EPA recognizes the difficulties that COVID-19 has placed on compliance testing and has issued the following policy (<https://www.epa.gov/sites/production/files/2020-03/documents/oecamemooncovid19implications.pdf>) that provides relevant guidance for lapsing certifications. EPA appreciates that you have reached out to us with this concern and that you continue to perform the permit testing and obtain the necessary certification when it becomes available.

Stay safe,
Kelly

Kelly McFadden, Branch Chief
U.S. EPA Region 10
Air Permits and Toxics Branch

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206-553-1679

From: Steven Petrin <spetrin@stimsonlumber.com>
Sent: Monday, April 06, 2020 7:28 AM
To: Todd, Bill <Todd.Bill@epa.gov>
Cc: lhiggins@cdatribe-nsn.gov; Kevin Crider <KCrider@stimsonlumber.com>; Beth F. Hodgson (beth@springenvironmental.com) <beth@springenvironmental.com>
Subject: Stimson Plummer - Notification to EPA of Potential COVID-19 Related Deviation & Request for Enforcement Discretion

Mr. Todd:

In accordance with Condition 5.8 of Air Operating Permit #R10T5020100 (see below), Stimson Lumber Company (Stimson) is required to perform quarterly visible emissions monitoring on the hogged fuel boiler using EPA Reference Method 9 or a continuous emissions monitoring. Stimson meets the requirement using EPA Reference Method 9 and does not have a continuous emissions monitor for this stack.

Condition 5.8: The permittee shall measure visible emissions from the boiler stack ... for one hour using the procedures specified in Condition 3.9.1 ... Once per calendar quarter, with consecutive tests at least 30 days apart.

According to Condition 3.1 of EPA Reference Method 9, "The certification shall be valid for a period of 6 months, at which time the qualification procedure must be repeated by any observer in order to retain certification." Stimson's second quarter monitoring is required by 6/30/2020, but due to Idaho Governor Little's *Shelter in Place* order (issued 3/25/2020), Washington Governor Inslee's *Stay Home/Stay Healthy* proclamation (issued 3/23/2020) and Oregon Governor Brown's *Stay Home/Stay Safe* proclamation (issued 3/23/2020), the three firms that provide EPA Method 9 certifications in this region have been unable to conduct their spring certifications which normally run from late-March through early May (see attached). The certification is a field certification and as such no on-line certification is available for EPA Method 9.

Stimson intends to continue performing the quarterly visible emissions monitoring, but unless certification is available in the region earlier, Stimson will perform up to two quarterly visible emissions monitoring events using a non-certified observer before the fall certification schedule (normally mid-September through late October).

The visible emissions from the boiler have been demonstrated to be less than the emissions limit under normal operating conditions, and as such continuing to operate under normal conditions is highly unlikely to create an acute risk or an imminent threat to human health or the environment.

Stimson requests that EPA Region 10 extend the requirement for the EPA Method 9 observer certification from 6 months to 12 months.

Sincerely,



Steven Petrin
Environmental Manager
503-860-7064